

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

VALERIE KLOOSTERMAN

Plaintiffs

Civil Action No. 1:22-cv-00944

Hon. Jane M. Beckering

v.

METROPOLITAN HOSPITAL, d/b/a
UNIVERSITY OF MICHIGAN HEALTH-WEST;
RAKESH PAI, an individual; RHAE-ANN
BOOKER, an individual; MARLA COLE, an
individual; THOMAS PIERCE, an individual; and
CATHERINE SMITH, an individual.

Defendants.

**DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO
FILE REPLY IN SUPPORT OF MOTION TO AMEND
CORRECTED FIRST AMENDED COMPLAINT**

Defendants University of Michigan Health West, Rakesh Pai, Rhae-Ann Booker, Marla Cole, Thomas Pierce, and Catherine Smith, by and through their attorneys, HALL, RENDER, KILLIAN, HEATH & LYMAN, PC, respond herein to Plaintiff's Motion for Leave to File Reply in Support of Motion to Amend Corrected First Amended Complaint:

1. For each of the reasons set forth in the attached Brief in Support, the Court should deny Plaintiff's Motion and grant Defendants their costs and such other relief as this Court deems proper.

Respectfully submitted,

HALL RENDER KILLIAN HEATH & LYMAN, PC

/s/ Jonathon A. Rabin

Jonathon A. Rabin (P57145)

Larry R. Jensen (P60137)

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